UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

By electronic mail and United Parcel Service
Thomas P. Jacobus, General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016-2514

NOV 1 0 2014

Dear Mr. Jacobus:

The United States Environmental Protection Agency, Region III ("EPA") has received the Washington Aqueduct's electronic mail request dated September 15, 2014 for authorization of an anticipated bypass pursuant to Part II, Section B, Paragraph 3 of the Washington Aqueduct's National Pollutant Discharge Elimination System permit No. DC0000019 ("NPDES Permit") through Outfalls 003 and 004 of the treatment systems installed in the two Georgetown Sedimentation Basins.

The NPDES Permit imposes certain effluent limitations and timing restrictions on discharges from the Washington Aqueduct's sedimentation basins to the Potomac River. Among these, the permittee may not discharge river sediment residuals from the Georgetown Sedimentation Basins through Outfalls 003 and 004 following completion of construction of the Residuals Processing Facility. NPDES Permit Part III, Section B, Paragraph 2.

The NPDES Permit contains the standard upset and bypass conditions set forth at 40 C.F.R. 122.41(m) and (n). A bypass is defined as "an intentional diversion of waste streams from any portion of a treatment facility." NPDES Permit Part II, Section B, Paragraph 3. The Washington Aqueduct has requested authorization of an anticipated bypass pursuant to this provision based upon the following.

The bypass is requested in order to remove sediment that has accumulated during a period of time when the newly installed dredge cabling and winch system was being integrated into the normal operating practices for continuously removing sediment accumulating in the two basins. The accumulation is partially as a result of an unanticipated design flaw in the current system. While the Aqueduct has identified means to ensure that sediment build up will not recur, the current accumulation of solids built up over the past two years exceeds the system's design capacity for it to be removed by dredge and sent to the Residuals Processing Facility, either normally or with a standalone project. The build up of sediment has created conditions that could affect odor and other potential aesthetic concerns with the finished drinking water.

For the foregoing reasons, the Washington Aqueduct is seeking authorization for an anticipated bypass in order to discharge the accumulated river sediment residuals in Sedimentation Basin #2 at Georgetown directly into the Potomac River. As part of that request, the Washington Aqueduct has agreed to conduct the discharge consistent with certain provisions in previous permits and under a previous Federal Facilities Compliance Agreement intended to minimize impact from the direct discharge of residuals. These include: (1) no discharge during spring spawning season (February 15 – June 30); (2) no discharge through Outfalls 003 and 004 unless the flow in the Potomac River is equal to or greater than 1500 million gallons per day (mgd) as measured at the gauge station at Little Falls (2.90 feet in river elevation); (3) extend the duration of the discharge (which includes a step of an initial draining of flocculent/sediment-laden water and a step that is a final flushing of remaining flocculent/sediment) from Outfalls 003 and 004 to a minimum of thirty-six (36) hours per basin, with each discharge step at a constant rate on an hourly basis; and (4) increase the quantity of untreated water used to flush and clean the basins to twice the amount used for each cleaning in 2001.

Based on and subject to the foregoing and the information and representations provided in the Washington Aqueduct's electronic message dated September 15, 2014, EPA determines that the requirements of Part II, Section B, Paragraph 3 have been satisfied and approves the request for authorization of an anticipated bypass.

If you have any technical questions please feel free to contact Andrew Seligman at 215-814-2097.

Sincerely,

Jon M. Capacasa, Director
Water Protection Division

Cc: DC DOE